

SHEILA LINDERMAN

Organic Certification Consultant · Organic Products Specialist

August 14, 2005

Mr. Arthur Neal
Director, Program Administration
National Organic Program
USDA – AMS – TSO – NOP
1400 Independence Avenue SW, Room 4008
Washington, DC 20050

RE: Docket Number TM – 04 – 07

Dear Mr. Neal, and the National Organic Standards Board:

On behalf of my client, Fine Estates from Spain, who is NOP certified by International Certification Services and under whom 26 growers produce grapes and olives in Spain, I would like to comment in favor of keeping the following materials on the National List under Section **205.601**.

Material	Reason for retention on National List
Elemental Sulfur	Insecticide
Oils, Horticultural	Insecticide
Pheromones	Control of moths and caterpillars on grapes
Soaps, Insecticidal	Insecticide
Fixed Coppers	Control of plant disease
Copper Sulfate	Control of plant disease
Elemental Sulfur	Control of plant disease
Elemental Sulfur	Soil amendment
Humic Acids	Soil amendment
Micronutrients	Soil amendment
Sulfates, carbonates, oxides or silicates of zinc, copper, iron, manganese, molybdenum, selenium or cobalt	Soil amendment

Please be assured that as organic equivalents become available, the growers will be informed and will use them to replace the above materials.

Respectfully submitted,



Sheila Linderman